1	PATRICK D. ROBBINS (CABN 152288)	
2	Acting United States Attorney PAMELA T. JOHANN (CABN 145558) Chief, Civil Division ELIZABETH D. KURLAN (CABN 255869) Assistant United States Attorneys	
3		
4	450 Golden Gate Avenue, Box 36055	
5	San Francisco, California 94102-3495	
6	Telephone: (415) 436-7298 Facsimile: (415) 436-6748 Elizabeth.Kurlan@usdoj.gov	
7	Attorneys for Defendants	
8	UNITED STATES DISTRICT COURT	
9	NORTHERN DISTRICT OF CALIFORNIA	
10	SAN JOSE DIVISION	
11		
12	HANG GONG,	Case No. 5:25-cv-00273-NC
13	Plaintiff,	
14	V.	STIPULATION TO PROPOSED SCHEDULE FOR PLAINTIFF'S AMENDED COMPLAINT;
15 16	PAMELA BONDI <sup>1</sup> , Attorney General, United States Department of Justice, <i>et al</i> .	ORDER
17	Defendants.	
18		
19	Plaintiff filed this mandamus action seeking adjudication of his Form I-485, Application to	
20	Register Permanent Residence or Adjust Status. Dkt. No. 1. The U.S. Attorney's Office received service	
21	of the complaint on January 10, 2025. On May 14, 2025, United States Citizenship and Immigration	
22	Services ("USCIS") approved Plaintiff's Form I-485 application. Plaintiff now seeks to amend his	
23	complaint to include his spouse's Form I-485 application.	
24	Accordingly, the parties have conferred and hereby stipulate and respectfully request the Court to	
25	grant the parties' proposed schedule for the filing of Plaintiff's amended complaint. The parties have	
26	Stant the parties proposed selection of the filing of Figure 5 amended complaint. The parties have	
27		
28	<sup>1</sup> Pamela Bondi is automatically substituted as the defendant in this matter in accordance with Federal Rule of Civil Procedure 25(d).	
	Stipulation Case No. 5:25-cv-00273-NC	1

agreed to the following schedule: 2. Dated: May 19, 2025

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Plaintiff will file an amended complaint by June 2, 2025.

Defendants will file their response to Plaintiff's amended complaint by July 2, 2025.

The parties respectfully request that the Court adopt the above-proposed schedule for Plaintiff's

amended complaint and Defendants' response.

Respectfully submitted,<sup>2</sup>

PATRICK D. ROBBINS Acting United States Attorney

/s/ Elizabeth D. Kurlan ELIZABETH D. KURLAN Assistant United States Attorney Attorneys for Defendants

Dated: May 19, 2025

/s/ Hang Gong HANG GONG Plaintiff (Pro Se)

## **ORDER**

Pursuant to stipulation, IT IS SO ORDERED.

Date: May 19, 2025



<sup>2</sup> In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.

Stipulation

Case No. 5:25-cv-00273-NC

2

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that she is an employee of the Office of the United States

Attorney for the Northern District of California and is a person of such age and discretion to be
competent to serve papers. The undersigned further certifies that on this day she caused a copy of the
following document(s):

## STIPULATION TO PROPOSED SCHEDULE FOR PLAINTIFF'S AMENDED COMPLAINT; [PROPOSED] ORDER

to be served by FIRST CLASS MAIL and email upon the party at the address stated below, which is the last known address:

Hang Gong 6092 Alcante Dr. San Jose, CA 95129 kidogong@gmail.com

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date: May 19, 2025

LILLIAN DO Paralegal Specialist